

Town of Milford

WATER UTILITIES



February 23, 2022

Justin Pimpare
Regional Pretreatment Coordinator
EPA New England
5 Post Office Square
Suite 100 OEP 06-03
Boston, MA 02109

Re: Industrial Pretreatment Program
2021 Annual Report
Milford, New Hampshire

Dear Mr. Pimpare:

In accordance with the Town of Milford's Industrial Pretreatment Program and the Town's National Pollutant Discharge Elimination System Permit requirements, please find attached the *Industrial Pretreatment Program Annual Report* for 2021. Assistance in the preparation of this report was provided by TeTon Environmental, PLLC.

If you have any questions regarding this submittal, please do not hesitate to call me at (603) 249-0661 or Marc Sexton of TeTon at (603) 587-0039.

Sincerely,

TOWN OF MILFORD

Jim Pouliot
Director

cc: Alexis Rastorguyeff, P.E., NHDES

Attachment: 2021 Industrial Pretreatment Program Annual Report



ANNUAL REPORT

INDUSTRIAL PRETREATMENT PROGRAM TOWN OF MILFORD, NEW HAMPSHIRE

COVERING THE COMPLIANCE PERIOD:
JANUARY 1, 2021 THROUGH DECEMBER 31, 2021

PREPARED FOR:
NPDES PERMIT NUMBER: NH0100471

PREPARED BY:



TeTon Environmental, PLLC
for
Town of Milford, NH



TOWN OF MILFORD, NH
Water Utilities Department
564 Nashua Street
Milford, NH 03055-8999
Tel: (603) 249-0661

Introduction

This Annual Report was prepared by the Town of Milford (Town)'s consulting engineer, TeTon Environmental, PLLC, as part of the Town's Industrial Pretreatment Program (IPP), under the direction of the Town's Director of Water Utilities.

The text of this report and its outline are in accordance with the Town's National Pollutant Discharge Elimination System (NPDES) Permit Attachment A – *NPDES Permit Requirement For Industrial Pretreatment Annual Report* issued by the United States Environmental Protection Agency (EPA).



TOWN OF MILFORD, NH
Water Utilities Department
564 Nashua Street
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EPA Region 1 Annual Pretreatment Report Summary Sheet January - December 2021

POTW Name: Milford Water Utilities Department

NPDES Permit #: NH0100471

Pretreatment Report Period Start Date: January 1, 2021

Pretreatment Report Period End Date: December 31, 2021

of Significant Industrial Users (SIUs): 5

of SIUs Without Control Mechanisms: 0

of SIUs not Inspected: 0

of SIUs not Sampled: 0

of SIUs in Significant Noncompliance (SNC) with Pretreatment Standards: 0

of SIUs in SNC with Reporting Requirements: 0

of SIUs in SNC with Pretreatment Compliance Schedule: 0

of SIUs in SNC Published in Newspaper: 0

of SIUs with Compliance Schedules: 0

of Violation Notices Issued to SIUs: 2

of Administrative Orders Issued to SIUs: 0

of Civil Suits Filed Against SIUs: 0

of Criminal Suits Filed Against SIUs: 0

of Categorical Industrial Users (CIUs): 4

of CIUs in SNC: 0

Penalties

Total Dollar Amount of Penalties Collected

of IUs from which Penalties have been collected:

Local Limits

Date of Most Recent Technical Evaluation of Local Limits:

Date of Most Recent Adoption of Technically Based Local Limits:

Pollutant	Limit (mg/L)	MAIHL (lb/day)
Arsenic	-	0.026
Cadmium	-	0.031
Chromium (III & IV)	-	0.413
Copper	-	0.525
Cyanide (Total)	-	0.465
Lead	-	0.231
Mercury	-	0.004
Molybdenum	-	0.045
Nickel	-	0.233
Selenium	-	0.082
Silver	-	0.119
Zinc	-	2.499

*The Town's January 2021 Development of Local Pollutant Controls was approved by EPA in July 2021. As of February 2022, an updated Sewer Use Ordinance has been drafted and is waiting for final legal review and adoption by the Town.

SECTION 1 - Industrial Users

Section 1.1 An updated list of all industrial users by category, as set forth in 40 CFR 403.8(f)(2)(i), indicating compliance or noncompliance with the following:

An updated list of all industrial users (IUs), including Class I - Significant IUs (SIUs) and Categorical IUs (CIUs), Class II – Minor IUs, Class III – General Permit IUs, Class IV – Exempted IUs, and Class V – Dry IUs, is detailed in the *Industrial User Master List* included as an attachment to this section of the IPP report. The following information has been included for all SIUs: business category, permitted average and maximum daily industrial flows, applicable CFR Part(s), type of pretreatment, permit number and permit expiration date.

Section 1.2 Compliance with baseline monitoring requirements for newly promulgated industries

No industries were subject to the baseline reporting requirements in 2021.

Section 1.3 Compliance status reporting requirements for newly promulgated industries

No industries were subject to the 90-day compliance reporting requirements in 2021.

Section 1.4 Periodic (semi-annual) monitoring reporting requirements

The *Industrial User Activity Report*, which is included as an attachment to this section, includes the submittal date of all IU periodic compliance reports (PCRs). All IUs required to submit PCRs did so during the 2021 compliance periods (January through June and July through December).

Section 1.5 Compliance with categorical standards

Compliance with categorical standards is documented in the Town's *Industrial Self-Monitoring, Town Monitoring and Compliance Status Matrix*, which is included as an attachment to this section. During the 2021 compliance period, there were no exceedances of federal categorical standards.

Section 1.6 Compliance with local limits

Compliance with local limits is documented in the Town's *Industrial Self-Monitoring, Town Monitoring and Compliance Status Matrix*. During the 2021 compliance period, there was one exceedance of a Town local limit (oil and grease).

Industrial User Master List



Town of Milford - Water Utilities Department
 564 Nashua Street
 Director: Jim Pouliot
 Telephone: 603-249-0661 Fax: 603-249-0699
 Milford, New Hampshire 03055-8999

Facility Name and Address Permit No. / Expiration

Activity / CFR Part(s) / Industrial Flow / Pretreatment

Class 1 Industrial Users

Hitchiner Manufacturing Co., Inc. - Automated Casting Facility (ACF)
 Steve Zack, Director, Corporate EH&S
 5 Scarborough Lane
 Milford, NH 03055
 603-732-1761
 Permit Number: M07
 Permit Expiration Date: 6/30/2023

Metal Molding and Casting - Investment casting of ferrous alloys.
 40 CFR Part 464 - Metal Molding and Casting Point Source Category
 -ACF Lab - polishing unit / humidifier
 -Clayton steam generator blowdown and water softener backwash
 -Compressed air condensate
 -Dewaxing steam boilerclaves
 -Fluoropenetrant preclean
 -Fluoropenetrant rinses, Lines A & B
 -Foundry casting mold quench
 -Foundry furnace cooling tower blowdown
 -Foundry furnace non-contact cooling water (emergency)
 -Gas water heater condensate
 -Shell room mixer and tools, etc. washout
 -X-ray film processors (2)

Permitted Industrial Flow:
 3,173 avg GPD / 7,576 max GPD
 4,000-gallon solids retention tank

Facility Name and Address Permit No. / Expiration

Activity / CFR Part(s) / Industrial Flow / Pretreatment

Class 1 Industrial Users

Industrial User Master List



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Facility Name and Address Permit No. / Expiration

Activity / CFR Part(s) / Industrial Flow / Pretreatment

Class 1 Industrial Users

Hitchiner Manufacturing Co., Inc. (Elm Street Complex)
Steve Zack, Director, Corporate EH&S
594 Elm Street
Milford, NH 03055
603-732-1761
Permit Number: M06
Permit Expiration Date: 9/30/2022

Metal Finishing - Investment casting of ferrous alloys.
40 CFR Part 433 - Metal Finishing Point Source Category
-GTO Clayton steam generator blowdown and water softener backwash
-GTO Compressed air process condensate
-GTO Dewaxing steam autoclaves
-GTO Fluoropenetrant preclean
-GTO Fluoropenetrant rinse
-GTO GoFog RO Reject and Backwash
-GTO Mold (Shell) water wash
-GTO New Shell Room A ultrasonic pre-wetting (of wax patterns)
-GTO Steam Dewax Table Condensate
-GTO X-ray film processing
-MCT Air compressor condensate
-MCT Autoclave Water Softener Backflush
-MCT Bus trench incidental leakage
-MCT Ceramics (a.k.a. Polishing) Lab - cross-sectioning inspections
-MCT Dewaxing Steam Autoclave
-MCT Floor washwater
-MCT Shell room miscellaneous equipment cleaning sink (final wash)
-MCT VIP cooling water reservoir
-Metal Casting Technology - drainage sump
-Plant 5 Air compressor condensate
-Plant 5 Annual closed-loop cooling system flushing
-Plant 5 Boiler Blowdown
-Plant 5 Dewaxing Steam Autoclave
-Plant 5 Elevator Sump

Facility Name and Address Permit No. / Expiration

Activity / CFR Part(s) / Industrial Flow / Pretreatment

Class 1 Industrial Users

-Plant 5 FPI Rinsewater
-Plant 5 GoFog RO Reject and Backwash
-Plant 5 Grain/Anodic Etch Rinse Tanks (to WWTS, T-1)
-Plant 5 Grain/Anodic Etch Scrubber Blowdown (to WWTS, T-8)
-Plant 5 HVAC Condensate
-Plant 5 KOH Autoclave (to WWTS, T-1)
-Plant 5 Laboratory (sink + polisher)
-Plant 5 Mold Prep
-Plant 5 Shell Rinses
-Plant 5 Wax Mold Cleaning

Permitted Industrial Flow:
12,976 avg GPD / 17,672 max GPD

MCT: Grit/Oil separation

Oil/water separators

Plant 5: Chemical treatment, ultrafiltration (UF) and final pH adjust

Silver recovery

Industrial User Master List



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Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment	Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment
Class 1 Industrial Users		Class 1 Industrial Users	
Marmon Utility LLC Mr. Kevin Boette, Plant Engineer 53 Old Wilton Road Milford, NH 03055 603 249-1202 Permit Number: M03 Permit Expiration Date: 2/29/2024	Fabricated Metal Products - Electrical cable - drawing of wire (mostly aluminum, some copper) and extruded plastic coating. 40 CFR Part 463 - Plastics Molding and Forming Point Source Category 40 CFR Part 467 - Aluminum Forming Point Source Category -Air compressor condensate -Continuous Vulcanization - Contact cooling blowdown -Floor washing -Ultrasonic rinse -Ultrasonic wash system Permitted Industrial Flow: 7,839 avg GPD / 10,233 max GPD	Saint-Gobain Crystals (33 Powers St.) Ms. Lisa B. True, EHS/Fab Manager 33 Powers Street Milford, NH 03055 603-249-2832 Permit Number: M05 Permit Expiration Date: 2/29/2024	Other Manufacturing - Synthetically fabricated sapphire-based products (Cylinders/tubes finished at 74 Powers) -Cooling tower #3 blowdown -Cooling tower #3 pool filter backwash -Floor washing (except Tooling Room) -Grinding/Saw area - Parts washing sink -Heat exchanger flush out (process cooling) -Material prep (aka quench) room -Polishing area - Colloidal silica sink -Polishing area - Ultrasonic unit and rinse sink -Process water loop blowdown -Pump Room 1 - Cooling tower system #1 blowdown -Pump Room 2 - Cooling tower system #2 blowdown -Sapphire Acid Etch Room -Small cutting area with rinsing sink Permitted Industrial Flow: 875 avg GPD / 1,745 max GPD pH neutralization

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Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment	Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment
Class 1 Industrial Users		Class 2 Industrial Users	
Special Hermetic Products, Inc. Anthony DeSantis, President 39 Souhegan Street Wilton, NH 03086 603-654-2002 Permit Number: M21 Permit Expiration Date: 10/31/2022	Metal Finishing - Hermetically-sealed electrical connectors, headers, capacitors, feedthrus 40 CFR Part 433 - Metal Finishing Point Source Category -Adjustment to match permitted flows -Chemical etch room -Chemical laboratory wastes (fume hood in Plating Area) -Cleaning/Rinsing (tanks 1, 2, 4) -Electroless Nickel Rinses (16, 17, 18) -Etching and activation rinses (7, 8) -Gold plating final rinse tanks (24, 25, 26) -RO system reject water -Tank and plating fixture cleaning (27) -Ultrasonic unit and steam age pots (soldering area) Permitted Industrial Flow: 146 avg GPD / 276 max GPD Final pH adjustment Ion exchange Nickel and cyanide removal	Amherst Label, Inc. Ms. Secret Lussier, 15 Westchester Drive Milford, NH 03055 (603) 673-7849 FAX (603) 673-7814 Permit Number: M10 Permit Expiration Date: 7/31/2024	Printing & Publishing - Commercial printer of Labels and Decal, Using water based and UV based Ink systems -Air compressor condensate -Air conditioning condensate -Anilox High Pressure Roller Washer Final Rinse (Flexowash) -Flexopress Tray Cleaning (Final Wash) -Flexopress Tray Cleaning (Soak Sink) -Silk Screen Hot Water Wash Permitted Industrial Flow: 50 avg GPD / 100 max GPD
Class 1 Average/Max Permitted GPD	25,009	37,502	
Number of Class 1 IUs: 5			

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Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment	Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment	
Class 2 Industrial Users		Class 2 Industrial Users		
CoorsTek Inc. (47 Powers St.) Mr. Michael Munjone, EHS Technician 47 Powers Street Milford, NH 03055 603-673-7560 Permit Number: M15 Permit Expiration Date: 9/30/2022	Other Manufacturing - Manufacturer of ignitors for gas-fired appliances -Air compressor condensate -Casting Room Sink - mill cleaning -Cooling tower blowdown (large 100-ton unit) -Cooling tower blowdown (small 40-ton unit) -Engineering Lab - surface grinder -Floor washing machine -Furnace area equipment cooling -Gang Reslotting -Maintenance shop sink -Misc. equipment cleaning sinks (7) -Ultrasonic / Utility Sink cleaning (Dewax - Wire Saw Area) -Wet Green Machining Permitted Industrial Flow: 4,376 avg GPD / 5,653 max GPD	CoorsTek Inc. (47 Powers St.) Mr. Michael Munjone, EHS Technician 47 Powers Street Milford, NH 03055 603-673-7560 Permit Number: M15 Permit Expiration Date: 9/30/2022		
Hollis Line Machine Mr. Tim Gregory, CMfgT 128 Old Wilton Road Milford, NH 03055 (603) 465-2251 Permit Number: M13 Permit Expiration Date: 1/25/2025	Fabricated Metal Products - Precision machining and fabrication of stainless steel (mostly prototype work) -Air compressor-related condensate -OMAX Water jet Permitted Industrial Flow: 900 avg GPD / 1,440 max GPD Solids removal	Hollis Line Machine Mr. Tim Gregory, CMfgT 128 Old Wilton Road Milford, NH 03055 (603) 465-2251 Permit Number: M13 Permit Expiration Date: 1/25/2025		
		Class 2 Average/Max Permitted GPD	5,326	7,193
		Number of Class 2 IUs: 3		

Industrial User Master List



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Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment	Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment
Class 3 Industrial Users		Class 3 Industrial Users	
Chemserve 317 Elm Street Milford, NH (603) 673-5440 Permit Number: M19 Permit Expiration Date: 3/31/2023	Laboratory (Medical, Analytical, Educational, Research) - Permitted Industrial Flow: 100 avg GPD / 100 max GPD	Fresenius Medical Care - Southern NH Dialysis Center Matt Warner, BioMed (on-site) 586 Nashua Street Milford, NH 03055 (800) 881-5101 Permit Number: M18 Permit Expiration Date: 5/31/2023	Health Care Services - -Carbon media system -Daily machine cleaning (vinegar) -Dialysate discharge -Hot water cleaning (end of day) -Multi-media filter -RO unit reject water -Water softener regeneration -Weekly machine cleaning (bleach) Permitted Industrial Flow: 106 avg GPD / 106 max GPD
Contemporary Automotive David Hammer, Dealer Principal 30 Hammond Road Milford, NH 603-673-5511 Permit Number: M22 Permit Expiration Date: 5/31/2023	Vehicle - Mechanical Services - Car dealership -Floor washing -Vehicle washing Permitted Industrial Flow: 500 avg GPD / 500 max GPD	Hampshire Paper Mr. Jim O'Toole, Plant Manager 1 Hampshire Drive Milford, NH 03055 (603) 673-6165 Permit Number: M12 Permit Expiration Date: 10/1/2022	Printing & Publishing - Paper/plastic wrapping material for florist industry -Boiler blowdown (w/ tempering water) -Evaporative cooling tower blowdown Permitted Industrial Flow: 8 avg GPD / 15 max GPD Oil/water separators Operation of O/W separator; Annual report regarding off-site ink cleanup wastewater.
DevTech PET Tim Therrien, IT and Facilities Manager 24 Powers Street Milford, NH 03055 603-402-2214 Permit Number: M17 Permit Expiration Date: 5/15/2022	Rubber & Plastics Products - Plastic bottle manufacturer -Air compressor condensate -Bottle pressure testing -Cooling tower blowdown -Cooling tower sand filter backwash Permitted Industrial Flow: 725 avg GPD / 1,050 max GPD		

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Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment	Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment
Class 3 Industrial Users		Class 4 Industrial Users	
Saint-Gobain Crystals (74 Powers St.) Ms. Lisa B. True, EHS/Tooling Manager 74 Powers Street Milford, NH 03055 603-249-2832 Permit Number: M16 Permit Expiration Date: 2/29/2024	Electrical & Electronic Components - Synthetically fabricated sapphire-based products - Grinding, shaping, polishing operations -Boron lapping rinse - sapphire parts (INACTIVE) -Boron lapping -sapphire parts (INACTIVE) -Floor washing (except Tooling Area) -Rinsing of sapphire parts after grinding/polishing - 3 sinks -Ultrasonic cleaning of ceramic parts Permitted Industrial Flow: 73 avg GPD / 107 max GPD	Aegis Container 277 Elm Street Milford, NH	Other Manufacturing - Custom packaging products; Cardboard; Corrugated & Non- Corrugated Permitted Industrial Flow: avg GPD / max GPD
The Loft Event Center (Brewery) Mr. Terry Connor, Owner 241 Union Square Milford, NH Permit Number: M23 Permit Expiration Date: 5/31/2025	Restaurant / Food Service - -Microbrewery tank washing Permitted Industrial Flow: 50 avg GPD / 100 max GPD	Amigos Mexican Restaurant 20 South Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
		Bar One 40 Nashua Street Milford, NH 03055	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
		Burger King 565 Nashua Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Class 3 Average/Max Permitted GPD	1,562		
Number of Class 3 IUs: 7			
		Café On The Oval 285 Union Square Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD

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Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment	Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment
Class 4 Industrial Users		Class 4 Industrial Users	
Casual Clean Center 321 Nashua Street Milford, NH 03055	Cleaning Services - Dry Cleaner Permitted Industrial Flow: avg GPD / max GPD Carbon filters	Dunkin Donuts 764 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Domino's Pizza 556 Nashua Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Family Dental Care of Milford Marcey Mason, Office Manager 154 Elm Street Milford, NH 03055	Dental Services - Permitted Industrial Flow: avg GPD / max GPD Amalgam Separator
Donut Fresh Express 62 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Gary's Harvest Restaurant 35 Main Street Wilton, NH 03086	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Dunkin Donuts 143 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Gatherings 29 Mont Vernon Milford, NH 03055	Restaurant / Food Service - Catering kitchen on-site Permitted Industrial Flow: avg GPD / max GPD
Dunkin Donuts 556 Nashua Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Giorgio's Italian Eatery 524 Nashua Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD

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Class 4 Industrial Users		Class 4 Industrial Users	
Golden Koi 437 Nashua Street Milford, NH 03055	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Hayward's Ice Cream (Seasonal) 383 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Golden Palace Restaurant (Edgewood Plaza) 321 Nashua Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Hilltop Café - Wilton 195 Isaac Fry Highway Wilton, NH 03086	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Greenleaf 54 Nashua Street Milford, NH 03055	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Jade Dragon Restaurant 189 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Grill 603 168 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Maple Brook Family Dentistry Jenna Raduille, Office Manager 36 Savage Road Milford, NH 03055	Dental Services - 40 CFR Part 441 - Dental Office Point Source Category Permitted Industrial Flow: avg GPD / max GPD
Haydon Kerk Motion Solutions Stan Brown, Director of Operations 69 Meadowbrook Park Drive Milford, NH (603) 465-7227	Electrical & Electronic Components - precision linear motion products Permitted Industrial Flow: avg GPD / max GPD		Amalgam Separator

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Class 4 Industrial Users		Class 4 Industrial Users	
Market Basket 21 Jones Rd Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Milford House of Pizza 265 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
McDonalds 599 Nashua Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Milford School Dept.(Director of Food Services) 100 West Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Mi Jalisco 586 Nashua Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	My Sister's Kitchen 286 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Milano House of Pizza 115 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Olde Kilkenny Pub 30 Middle Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Mile Away Restaurant 52 Federal Hill Rd Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Papa Joe's Humble Kitchen 237 South Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD

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Class 4 Industrial Users		Class 4 Industrial Users	
Penguin Mart 738 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Souhegan Valley Dental 99 Amherst Street Milford, NH 03055 603-673-1233	Dental Services - 40 CFR Part 441 - Dental Office Point Source Category Permitted Industrial Flow: avg GPD / max GPD
Sake House 222 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Subway of Milford 222 Elm Street Milford, NH	Amalgam Separator Dr. Vasantha also present
Sal's Pizza 180 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Subway of Milford 614 Nashua Street Milford, NH 03055	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Shaw's Supermarket Lordens Plaza Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Sun Mart of Milford 71 Mont Vernon Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Silkscreen Graphics 127 Nashua Street Milford, NH 03055 (603) 673-6033	Printing & Publishing - Permitted Industrial Flow: avg GPD / max GPD		

Industrial User Master List



Town of Milford - Water Utilities Department
564 Nashua Street
Director: Jim Pouliot
Telephone: 603-249-0661 Fax: 603-249-0699
Milford, New Hampshire 03055-8999

Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment	Facility Name and Address Permit No. / Expiration	Activity / CFR Part(s) / Industrial Flow / Pretreatment
Class 4 Industrial Users		Class 4 Industrial Users	
Taco Time Authentic Mexican 244 Elm Street Milford, NH 03055	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD This is a food truck	Wendy's Old Fashioned Hamburgers 153 Elm Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
The Hills Restaurant at Hampshire Hills 50 Emerson Rd Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Wickedpissahchowdah 20 South Street Milford, NH 03055	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
The Riverhouse Café 123 Union Square Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Wilton House of Pizza 28 Forest Rd Wilton, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Union Coffee Co. 42 South Street Milford, NH 03055	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Wok Wok 586 Nashua Street Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD
Union Street Grill 4 Union Square Milford, NH	Restaurant / Food Service - Permitted Industrial Flow: avg GPD / max GPD	Class 4 Average/Max Permitted GPD Number of Class 4 IUs: 52	

Industrial User Master List



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Facility Name and Address Permit No. / Expiration

Activity / CFR Part(s) / Industrial Flow / Pretreatment

Class 5 Industrial Users

Cirtronics Corporation (on septic)
 Tim Devine, Facilities Manager
 528 Rte 13
 Milford, NH 03055

Electrical & Electronic Components -
 Printed Circuit Board population

Permitted Industrial Flow:
 avg GPD / max GPD

Hi-Tech Fabricators
 Milford, NH 03055-3117
 (603) 672-3766
 10 Scarborough Lane
 Milford, NH 03055
 (603) 672-3766

Metal Finishing - Sheet Metal Wholesale
 & Manufacturers

Permitted Industrial Flow:
 avg GPD / max GPD

Hy-Ten
 38 Powers Street
 Milford, NH

Other Manufacturing - custom plastic
 injection molding supplier

Permitted Industrial Flow:
 avg GPD / max GPD

Yankee Toy Box
 48 Powers Street
 Milford, NH 03055

Retailer/Wholesaler - On-line retailer

Permitted Industrial Flow:
 avg GPD / max GPD

Class 5 Average/Max Permitted GPD

Number of Class 5 IUs: 4

TOTAL Average / Max Permitted GPD

31,897

46,673

Total Number of IUs: 71



Class 1 Industrial User Activity Report for Dates: 1/1/2021 to 2/9/2022

Town of Milford - Water Utilities Department
564 Nashua Street
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Milford, New Hampshire 03055-8999

<i>Facility Name</i>	<i>Date</i>	<i>Activity</i>	<i>Follow-up Required?</i>	<i>Comments</i>	<i>Due Date</i>	<i>Closure Date</i>
Hitchiner Manufacturing Co., Inc. - Automated Casting Facility (ACF)	1/29/2021	PCR Submittal	<input type="checkbox"/>	Semiannual JUL - DEC 2020 PCR received.		
	3/25/2021	Noncompliance Self-Reporting	<input type="checkbox"/>	Email from S. Zack regarding TPH limit excursion (126 mg/L) of a 3-5-21 sample.		
	3/31/2021	Issued Notice of Violation	<input checked="" type="checkbox"/>	Verbal NOV issued for TPH exceedance that occurred on 3-5-21. 5-11-21: Resample results indicate compliance TPH (< 5 mg/L).		5/11/2021
	3/31/2021	Telephone Call	<input type="checkbox"/>	Steve Zack contacted M.Sexton (TeTon) to discuss ACF O&G excursions and high pH observed in same sample on 3/9/21. Hitchiner did find the likely cause of the higher than normal pH (boiler usage has increased and operators were using more CoilGuard 400 which has a high pH - but a review of the CoilGuard ingredients didn't indicate any petroleum materials), but it does not appear to be correlated to the high O&G. Steve will be submitting a follow-up letter shortly outlining his investigation.		
	5/24/2021	Telephone Call	<input type="checkbox"/>	Steve Zack contacted Town re: a non-contact cooling water leak that occurred over the weekend. Currently, the water is in a vault and some has been pumped to totes; Hitchiner is requesting permission to discharge this water to the sewer system. For a description of the event, see 5-24-21 (10:07am) email from Steve Zack to Town and TeTon. (note: M.Sexton spoke with Brad W. over the phone regarding this event and how to proceed - Brad will contact Steve at Hitchiner and Susan at the Town).		
	7/27/2021	PCR Submittal	<input type="checkbox"/>	Semiannual JAN - JUN 2021 PCR received.		
	8/26/2021	Permit Modification	<input type="checkbox"/>	Permit revised to include new EPA-approved local pollutant controls.		

NOTE: Shaded items are those that are overdue.



Class 1 Industrial User Activity Report for Dates: 1/1/2021 to 2/9/2022

Town of Milford - Water Utilities Department
564 Nashua Street
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Milford, New Hampshire 03055-8999

<i>Facility Name</i>	<i>Date</i>	<i>Activity</i>	<i>Follow-up Required?</i>	<i>Comments</i>	<i>Due Date</i>	<i>Closure Date</i>
Hitchiner Manufacturing Co., Inc. - Automated Casting Facility (ACF)	10/14/2021	Annual Inspection	<input type="checkbox"/>	2021 annual inspection. Employee count has increased since last year. Met with GM Brian Zimmer briefly. Exterior 4,000-gallon settling tank was cleaned out in SEPT 2021 by Clean Harbors (work order reviewed during visit). Other discussion topics included Hitchiner's recent rebuild/upgrade to the passivation line (no wastewater discharge), citric acid soluble wax leach process (no wastewater discharge), Elm St. Complex Plant 5 upgrade to wastewater treatment system (with future discussions needed regarding metals permit limits, in particular nickel and moly), and a request from Hitchiner to obtain a full electronic copy of the current permit for ACF and Elm St. that includes all the recent revisions [note: this was completed on 10-14-21 after the visit]. No new processes are anticipated in next 12-month period.		
	12/16/2021	Monitoring (compliance - by Town)	<input type="checkbox"/>	Follow-up for Hitchiner: 1) Provide SDS for citric acid associated with soluble wax leach process. Annual Town compliance monitoring completed. TPH screening level exceedance.		
	1/10/2022	Screening Level Exceedance	<input checked="" type="checkbox"/>	M.Sexton notified Steve Zack that the Town compliance results from a 12-16-21 sample indicated an O&G (TPH) screening level excursion. Follow-up resampling is required. 1-10-22 & 1-24-22: Response received from Hitchiner and a resampling event will be scheduled.		
	1/21/2022	Correspondence	<input type="checkbox"/>	Steve left a VM regarding a power failure at ACF this morning that required the use of once-through Town water for non-contact cooling of furnaces. See 1-21-22 email follow-up from Steve for additional details.		
	1/31/2022	PCR Submittal	<input type="checkbox"/>	Semiannual JUL - DEC 2021 PCR received.		
Hitchiner Manufacturing Co., Inc. (Elm Street Complex)	1/29/2021	PCR Submittal	<input type="checkbox"/>	Semiannual JUL - DEC 2020 PCR received.		

NOTE: Shaded items are those that are overdue.



Class 1 Industrial User Activity Report for Dates: 1/1/2021 to 2/9/2022

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Milford, New Hampshire 03055-8999

<i>Facility Name</i>	<i>Date</i>	<i>Activity</i>	<i>Follow-up Required?</i>	<i>Comments</i>	<i>Due Date</i>	<i>Closure Date</i>
Hitchiner Manufacturing Co., Inc. (Elm Street Complex)	7/14/2021	Permit Modification	<input type="checkbox"/>	Revised permit per JUN 2021 NHDES IDR submittal (increased flow due to non-performing RO system; additional flow from polishing activity; flows updated based on operational experience).		
	7/26/2021	Telephone Call	<input type="checkbox"/>	M.Sexton (TeTon) returned a VM from Steve Zack from 7/23. MCT boilerclave has a backwash from the new softener treatment system (which was installed in earlier this month). Since installation, all condensate from boilerclave is being collected and will be tested for sulfur-related compounds and pH as requested earlier this year. A backwash did occur and was collected also (not discharged to sewer). Hitchiner will ship existing collected condensate and backwash for off-site disposal, then begin collecting condensate for analytical testing. The next backwash will also be collected separately and tested for the same sulfur compounds and pH. No condensate or backwash will be discharged until approved by the Town.		
	7/27/2021	PCR Submittal	<input type="checkbox"/>	Semiannual JAN - JUN 2021 PCR received.		
	9/21/2021	Annual Inspection	<input type="checkbox"/>	2021 annual inspection. Toured Plant 5, GTO, MCT and building with 90-day hazardous waste storage area. Employee count and production volumes have decreased over last 12-18 months. Briefly met with GMs of Plant 5 and GTO facilities. MCT facility activities has come back down to 2019 levels (was busy last 18 months before Plant 5 was operational). With the exception of a replacement wastewater treatment system in Plant 5 (scheduled to occur during Christmas shutdown 2021), no new process changes (other than those already planned and permitted for) are anticipated. The replacement WWTS in Plant 5 will be a UF system with no RO system (unlike the initial set-up). No new raw materials were reported.		
				Follow-up for Hitchiner: 1) Confirm Plant 5 WWTS flow and pH meter calibration frequency [partially completed 9-21-21]; 2) Forward Town SDS for Nexguard 22358 observed in MCT near new autoclave [completed 9-21-21].		
	10/14/2021	Permit Modification	<input type="checkbox"/>	Permit revised to include new EPA-approved local pollutant controls.		

NOTE: Shaded items are those that are overdue.



Class 1 Industrial User Activity Report for Dates: 1/1/2021 to 2/9/2022

Town of Milford - Water Utilities Department
564 Nashua Street
Director: Jim Pouliot
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Milford, New Hampshire 03055-8999

Facility Name	Date	Activity	Follow-up Required?	Comments	Due Date	Closure Date
Hitchiner Manufacturing Co., Inc. (Elm Street Complex)	11/9/2021	Telephone Call	<input type="checkbox"/>	Team virtual meeting with Steve and Claire. Discussion points included: 1) Bench-scale testing results for P5 WWTS Upgrade/Mo Allocation; 2) IDP application for P5 WWTS Upgrade; 3) Temporary scrubber configuration; and 4) Updates to Flow Summary Report with new/existing WW streams. IDP application for modifications is forthcoming in next week or two. WWTS Upgrade is planned for mid December 2021 - beginning of January 2022. See notes for additional detail.		
	11/16/2021	Noncompliance Self-Reporting	<input checked="" type="checkbox"/>	Email from S. Zack informing Town of chromium screening level exceedance. 11-23-21: Resample obtained on 11-16-21 and result forwarded to Town - chromium result indicates compliance.		11/23/2021
	12/16/2021	Monitoring (compliance - by Town)	<input type="checkbox"/>	Annual Town compliance monitoring completed.		
	1/31/2022	PCR Submittal	<input type="checkbox"/>	Semiannual JUL - DEC 2021 PCR received.		
Marmon Utility LLC	1/28/2021	PCR Submittal	<input type="checkbox"/>	Semiannual PCR for JUL - DEC 2020 received.		
	3/18/2021	Permit Issuance	<input type="checkbox"/>	Class 1 IDP reissued.		
	7/13/2021	PCR Submittal	<input type="checkbox"/>	Semiannual PCR for JAN - JUN 2021 received.		
	8/19/2021	Annual Inspection	<input type="checkbox"/>	2021 annual inspection. Employee count has increased by approx. 30% from 2020 employee count. Production levels have remained strong during all of 2020 and 2021 to date. No new processes were reported. Major discussion points include: Recently approved Town local limits and forthcoming permit revisions; TTO and O&G sampling requirements (make-up sampling for TTOs for APR-JUN monitoring period is required). Recent July self-monitoring event and elevated TPH values at 004; Upcoming billing changes for all IUs in Town for IPP services.		
				FOLLOW-UP items for Marmon: None.		
	8/24/2021	Permit Modification	<input type="checkbox"/>	Permit revised to include new EPA-approved local pollutant controls.		
	11/29/2021	Monitoring (compliance - by Town)	<input type="checkbox"/>	Annual Town compliance monitoring completed.		

NOTE: Shaded items are those that are overdue.



Class 1 Industrial User Activity Report for Dates: 1/1/2021 to 2/9/2022

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564 Nashua Street
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Milford, New Hampshire 03055-8999

<i>Facility Name</i>	<i>Date</i>	<i>Activity</i>	<i>Follow-up Required?</i>	<i>Comments</i>	<i>Due Date</i>	<i>Closure Date</i>
Marmon Utility LLC	2/7/2022	Issued Notice of Violation	<input checked="" type="checkbox"/>	Email NOV for late semiannual reporting. 2/8/22 - Seminannual PCR submitted.		2/8/2022
	2/8/2022	PCR Submittal	<input type="checkbox"/>	Semiannual PCR for JUL - DEC 2021 received.		
Saint-Gobain Crystals (33 Powers St.)	1/20/2021	PCR Submittal	<input type="checkbox"/>	Semi-annual PCR for JUL - DEC 2020 received.		
	3/1/2021	Permit Issuance	<input type="checkbox"/>	Class 1 permit reissuance (effective 3/1/2021).		
	7/27/2021	PCR Submittal	<input type="checkbox"/>	Semi-annual PCR for JAN - JUN 2021 received.		
	12/2/2021	Annual Inspection	<input type="checkbox"/>	2021 annual site visit. For health reasons, J. Pouliot was unable to attend this inspection. No new processes or raw materials reported during visit. Employee count has increased slightly at both the 33 and 74 Powers St. facilities. Topics discussed during the visit include: Water quality of Town water supply, recent elevated mercury sampling result, Town's recently approved local limits and pending permit revisions, new personnel at Chemserve, potential for increased production demand (and 24/7 schedule) in 2022, and potential for adding CNC-EDM machines at 74 Powers St. in 2022.		
				*Follow-up actions (by S-G): None.		
	12/10/2021	Monitoring (compliance - by Town)	<input type="checkbox"/>	Annual Town compliance monitoring completed.		
	1/4/2022	Permit Modification	<input type="checkbox"/>	Permit revised to include new EPA-approved local pollutant controls.		
	1/26/2022	PCR Submittal	<input type="checkbox"/>	Semi-annual PCR for JUL - DEC 2021 received.		
Special Hermetic Products, Inc.	1/29/2021	PCR Submittal	<input type="checkbox"/>	PCR for JUL - DEC 2020 submitted.		
	7/27/2021	PCR Submittal	<input type="checkbox"/>	PCR for JAN - JUN 2021 submitted.		
	8/17/2021	Permit Modification	<input type="checkbox"/>	Permit revised to include new EPA-approved local pollutant controls.		
	12/1/2021	Monitoring (compliance - by Town)	<input type="checkbox"/>	Town compliance monitoring completed.		

NOTE: Shaded items are those that are overdue.



Class 1 Industrial User Activity Report for Dates: 1/1/2021 to 2/9/2022

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Milford, New Hampshire 03055-8999

<i>Facility Name</i>	<i>Date</i>	<i>Activity</i>	<i>Follow-up Required?</i>	<i>Comments</i>	<i>Due Date</i>	<i>Closure Date</i>
Special Hermetic Products, Inc.	12/17/2021	Annual Inspection	<input type="checkbox"/>	2021 annual site visit. Employee count has increased to 52 (from 45 employees a year ago). Waste types and processes have remained consistent (no changed reported). Waste hauler pick-up delays currently exist. No issues with pretreatment system reported. A new production furnace is expected to replace the existing oven in June or July 2022 (so two furnaces will then be used) and will include non-contact cooling water. A new coolant is now being used in the three CNC machines. Also, a new air compressor has arrived on-site and will be used for a new on-site nitrogen generator. The new compressor will replace the existing 5HP compressor.		
	1/6/2022	PCR Submittal	<input type="checkbox"/>	Follow-up by Special Hermetics: None [note: a copy of the new coolant SDS was provided to the Town during the visit]. PCR for JUL - DEC 2021 submitted.		

NOTE: Shaded items are those that are overdue.

Town of Milford, New Hampshire - Industrial Pretreatment Program
Industrial Self-Monitoring, Town Monitoring and Compliance Status Matrix

Monitoring Year: January to December 2021

NOTE: Entries in cells indicate completion of sampling events, noncompliance if any, and what enforcement action was taken.													
INDUSTRY	MONITORING ITEMS	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
SAINT-GOBAIN 33 Powers St. (IDP effective March 2021) (reports due July 31 and January 31)	Self - 2 x year @ Materials prep room discharge after neutralization/deionization Flow (gpd), pH - copy of discharge log must be submitted	Discharge log submitted						Discharge log submitted					
	Self - 2 x year @ Materials prep room discharge after neutralization/deionization Composite: Ag, As, Cd, Cu, Hg, Mo, Zn	2-5-21: 7 metals, pH NO EXCEEDANCES						8-20-21: 7 metals, pH NO EXCEEDANCES 10-29-21: Hg - NO EXCEEDANCE					
	BMP narrative statement	BMP narrative included in report						BMP narrative included in report					
	Town - 1 x year @ Materials prep room discharge after neutralization/deionization (001) Composite: Al, Ag, As, Cd, Cu, Hg, Mo, Ni, Pb, Zn, pH, Cyanide	12-10-21: All paremeters sampled NO EXCEEDANCES											
HITCHINER - ACF (IDP re-issued August 2021) (reports due July 31 and January 31)	Self - 2 x year Single Grab: Cu, Pb, Mo, Zn @ casting quench tank (001)	3-8-21: 8 metals NO EXCEEDANCES						Quench tank was not used during this 6-month period					
	Self - 1 x year (JAN-JUN) - TTOs Single Grab: VOCs (624) and ABNs (625) @ casting quench tank (001)	3-8-21: VOCs, ABNs NO EXCEEDANCES											
	Self - 2 x year 4 grab sample composite: Ag; pH (single grab) @ X-ray sampling port (005)	3-4-21: Ag, pH - NO EXCEEDANCES						8-11-21: Ag, pH - NO EXCEEDANCES					
	Self - 2 x year Time Composite (8am - 3pm): Ag, Cr, Ni, Pb, Zn @ flow exiting MH #3 (006) Grab: TPH (4 grabs - approx. 2-hr. intervals during first shift), pH (single) @ 006	3-5-21: 7 metals, TPH, pH; TPH limit exceedance (126 mg/L vs. 100 mg/L limit) 5-11-21 (resample): pH, TPH resample (< 5 mg/L)						9-27-21: 5 metals, TPH, pH NO EXCEEDANCES					
	Self - Report 2 x year -Casting Quench Log -Silver Recovery Log -Pounds of ferrous alloy poured -Flow from FPI (004) and X-ray (005) - report average and maximum daily flows	Logs and information included in report						Logs and information included in report					
	Town - 1 x year -Single grab @ 001 (quench): Cu, Mo, Pb, Zn, VOCs, ABNs -Single grab @ 005 (x-ray): Ag, pH Composite @ 006: Ag, Al, Cd, Cr, Cu, Hg, Mo, Ni, Pb, Zn; CN, pH, O&G (SGT)	12-16-21: All parameters monitored (except quench tank which has been empty) TPH screening level exceedance (125 mg/L vs. 100 mg/L SL) TPH resampling required											

Town of Milford, New Hampshire - Industrial Pretreatment Program
Industrial Self-Monitoring, Town Monitoring and Compliance Status Matrix

Monitoring Year: January to December 2021

NOTE: Entries in cells indicate completion of sampling events, noncompliance if any, and what enforcement action was taken.													
INDUSTRY	MONITORING ITEMS	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
HITCHINER - ELM STREET FACILITY issued Nov 2019, Rev. Jan 2020, Oct 2021) (reports due July 31 and January 31)	Self - 2 x year <u>Grab composites</u> : Ag, Al, Cd, Cr, Cu, Mo, Ni, Pb, Zn, pH (single grab), CN, ABNs, VOCs, Pesticides, O&G (HEM-SGT) @ 001, Plant 1 - GTO FPI rinsewater sumps (3)	6-3-21: All parameters reported NO EXCEEDANCES						10-20-21: All parameters reported Chromium screening level exceedance (0.732 mg/L vs. 0.35 SL) 11-16-21: Resample - NO EXCEEDENCE (< 0.01 mg/L)					
	Self - 2 x year <u>Grab composites</u> : Ag, pH (single grab) @ Plant 1 - GTO X-ray film processing discharge	3-12-21: Ag, pH NO EXCEEDANCES						11-2-21: Ag, pH NO EXCEEDANCES					
	Self - 2 x year Grab: pH, O&G (HEM) @ GTO 004 (ultrasonic wax pattern rinse)	5-21-21: O&G, pH NO EXCEEDANCES						10-8-21: O&G, pH NO EXCEEDANCES					
	Self - 2 x year, MCT-001 <u>Grab composites</u> : Cu, Mo, O&G (HEM-SGT) @ Building interior discharge location	5-24-21: pH, 7 metals, O&G NO EXCEEANCES						12-17-21: pH, 2 metals, TPH NO EXCEEANCES					
	Self - 2 x year <u>Grab composites</u> : Ag, Cd, Cr, Cu, Ni, Pb, Zn, pH (single grab), CN, ABNs, VOCs, Pesticides, O&G (HEM-SGT) @ 008, Plant 5 FPI rinsewater sumps	5-21-21: FPI Line 2 (only active sump), all parameters reported NO EXCEEDANCES						10-20-21: FPI Line 2 (only active sump), all parameters reported NO EXCEEDANCES					
	Self - 2 x year <u>Grab composites</u> : Ag, Cd, Cr, Cu, Ni, Pb, Zn, CN, VOCs, ABNs, Pesticides @ 009 - Plant 5 SP-1 after UF	6-8-21: 7 metals, CN, Organics NO EXCEEDANCES						11-11-21: 7 metals, CN, Organics NO EXCEEDANCES					
	Self - 2 x year <u>Time composites</u> : Al, Mo, Ni, Zn, Total O&G, pH @ 011 - Plant 5 Combined industrial MH	5-24-21: All parameters reported NO EXCEEDANCES						10-14-21: 4 metals, O&G 10-15-21: pH NO EXCEEDANCES					
	Self - Report 2 x year GTO Flow - FPI flow logs; Rinse tank (004) MCT Flow - Discharge log GTO Silver Recovery System - submit copy of maintenance log	July 2021: Information submitted						January 2022: Information submitted					
	Self - Report 2 x year Plant 5 Flow, pH - submit FPI log (008); monthly avg. and max flow and pH (min, max, avg.) on days when flows occur from pretreatment effluent T-7 (010)	July 2021: Information submitted						January 2022: Information submitted					
	Town - 1 x year See Chemserve Matrix	12-16-21: All parameters monitored NO EXCEEDANCES											

Town of Milford, New Hampshire - Industrial Pretreatment Program
Industrial Self-Monitoring, Town Monitoring and Compliance Status Matrix

Monitoring Year: January to December 2021

NOTE: Entries in cells indicate completion of sampling events, noncompliance if any, and what enforcement action was taken.													
INDUSTRY	MONITORING ITEMS	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
MARMON UTILITY (IDP effective Mar 2021; Rev. Aug 2021) (reports due July 31 and January 31)	Ultrasonic batch (004): Self - 2 x year (APR-JUN, JUL-SEP), 3-grab composite: Cr, Zn, Sulfate, pH, Cyanide, TTOs / Self - 1x year (APR-JUN): Al, Cu				4-15-21: Al, Cu, Cr, Ni, Zn, Sulfate, TPH, cyanide, pH NO EXCEEDANCES			7-12-21: Al, Cr, Ni, Zn, Sulfate, TPH, cyanide, pH NO EXCEEDANCES			10-12-21: VOCs, ABNs, Pesticides/PCBs, pH		
	CV Cooling (005): Self - VOCs 2 x year (APR-JUN, JUL-SEP) Grab: Al, Cu (1 x year; APR-JUN)				4-15-21: VOCs, Copper NO EXCEEDANCES			7-12-21: VOCs Chloroform screening level excursion (2.2 mg/L) 11-5-21: Chloroform retest (<0.010 mg/L)					
	Ultrasonic rinse (006): Self - 2 x year (APR-JUN, JUL-SEP), grab: Cr, Zn, pH, Cyanide, TTOs / Self - 1 x year (APR-JUN): Al, Cu				4-15-21: Al, Cu, Cr, Ni, Zn, TPH, cyanide pH NO EXCEEDANCES			7-12-21: 4 metals, cyanide, TPH, pH 9-14-21: O&G(T), pH			10-12-21: O&G(T), pH		
	Floor Wash (007): Self - 1 x year (APR-JUN), grab. Al, Cu				4-15-21: Copper NO EXCEEDANCE								
	Self - 2 x year (Jan. and July reports) 004: Submit wastewater discharge log 005: Submit copy of totalizer readings log 006: Submit flows (avg & max)				Logs submitted for 004, 005, and 006						Logs submitted for 004, 005, and 006		
	Town - 1 x year -004 (grab): Ag, Al, Cd, Cr, Cu, Hg, Mo, Ni, Pb, Zn, CN, Sulfate, TPH, VOCs, ABNs, pH -CV 005 (grab): 10 metals, VOCs, CN, pH -Floor Wash Water: 10 metals, VOCs, pH							11-29-21: All parameters and locations sampled and reported. NO EXCEEDANCES					
SPECIAL HERMETICS (IDP effective Nov. 2019, Rev. Aug 2021) (reports due July 31 and January 31)	Self - 2 x year @ 001 pH, Flow (pH and flow logs must be submitted with each report)				JUL 2021: pH and flow records submitted						DEC 2021: pH and flow records submitted		
	Self - 2 x year Ag, Cd, Cr, Cu, Ni, Pb, Zn, TPH @ 001; CN @002	3-17-21: All parameters sampled at both locations NO EXCEEDANCES						8-18-21: All parameters sampled at both locations NO EXCEEDANCES					
	TTOs @ 001 - TOMP Plan certification or sampling required				TOMP certification submitted						TOMP certification submitted		
	Town - 1 x year @ 001 O&G (SGT), 10 metals, sulfate, VOCs, ABNs, PCBs, Pesticides, pH CN (@002)							12-1-21: All parameters sampled and reported NO EXCEEDANCES					

SECTION 2 - Compliance/Enforcement/Monitoring Activities

Section 2.1 SIU facility inspections performed by the Town

The *Industrial User Activity Report (by Facility)*, which is included as an attachment to Section 1 of this report, includes all SIU facility inspections performed by the Town. All SIUs were inspected during the Town's 2021 IPP year.

Section 2.2 Summary of SIUs sampled by the Town

Town monitoring of all SIUs is documented on the *Industrial Self-Monitoring, Town Monitoring and Compliance Status Matrix*, and the *Industrial User Activity Report (by Facility)*, which are included as attachments to Section 1 of this report. A subcontracted analytical laboratory, under the direction of the Town's Water Utilities Director, completed all the required monitoring at all SIUs.

Section 2.3 Summary of compliance schedules issued

No new compliance schedules (related to noncompliance or enforcement actions) were issued during the 2021 IPP year.

Section 2.4 Summary of written notices of violations (NOVs) issued

The *Industrial User Activity Report*, which is included as an attachment to Section 1 of this report, includes all NOVs issued by the Town. Two NOVs (by email) were issued to SIUs for the Town's 2021 IPP year (O&G limit exceedance and late reporting).

Section 2.5 Summary of administrative orders issued

The Town did not issue any administrative orders during the 2021 IPP year.

Section 2.6 Summary of civil or criminal suits filed

The Town did not file any civil or criminal suits during the 2021 IPP year.

Section 2.7 Summary of penalties obtained

The Town did not issue any penalties during the 2021 IPP year.

SECTION 3 - Significant Non-Compliance Industries Requiring Publication

No SIUs were found to be in Significant Non-Compliance (SNC) during the Town's 2021 IPP year.

Identification of the noncompliance events identified during the year is presented on the *Industrial Self-Monitoring, Town Monitoring and Compliance Status Matrix* attached to Section 1 of this report.

SECTION 4 - Status of Pretreatment Program Effectiveness

This section includes a narrative description of the Town's IPP effectiveness including present and proposed changes to the following:

Section 4.1 Funding and resources

The Town supports and applies sufficient funding to effectively implement the Town's IPP. The Town recognizes the importance of adequate funding to ensure the Town meets its IPP obligations. In 2021 the Town continued to contract with TeTon Environmental, PLLC (TeTon) to assist the Water Utilities Director with administering the Town's IPP. The Town is continuing to utilize TeTon's services in 2022.

Section 4.2 Program staffing

The IPP operates within the Town's Water Utilities Department under the direction of the Director. The facility no longer employs a part-time Laboratory Technician that previously allowed the Laboratory Supervisor the time to administer the IPP. This, combined with the new Laboratory Supervisor's inexperience in IPP administration, resulted in the department increasing TeTon's contract role assisting the Water Utilities Director with IPP implementation. TeTon is primarily tasked with permitting, inspections, review and follow-up of periodic compliance reports, and IPP technical assistance.

The Town continues to subcontract compliance monitoring activities at the SIU facilities using Chemsolve, Inc. to provide the field sampling and analytical testing services.

Section 4.3 Sewer Use Ordinance (SUO), regulations, and rules

To comply with changes to the 40 CFR 403 Streamlining Rule, Milford updated its Sewer Use Ordinance in 2008 with the assistance of TeTon. Milford received approval of the final draft from the USEPA in a letter dated December 2, 2008 and from the NHDES in a letter dated December 15, 2008. On December 19, 2008 the Sewer Use Ordinance was signed and adopted by the Town of Milford, Water and Sewer Commission. In 2021, the Town started the process of updating its SUO. As of the time of this report, a draft update has been completed and is currently being internally reviewed.

Section 4.4 Program Implementation in Wilton

As of October 2013, there was one significant industrial user located in the satellite community of Wilton, New Hampshire, which commenced discharging industrial wastewater to the Milford POTW during 2014. There was also one permitted Class II IU; however this IU has ceased all operations and permanently closed as of August 13, 2021. A new intermunicipal agreement was approved in March 2015 with Wilton that provides a much greater level of detail regarding roles and responsibilities for IPP implementation. An effective relationship exists with Milford representatives and the Wilton IUs.

Drive-by inspections are conducted periodically to investigate new industries that may have located in Wilton. Although Milford's priority pollutant scan results from the Wilton sampling location did not show unusual amounts of pollutants, it is Milford's intent to continue to maintain oversight of facilities in Wilton that may have the potential of discharging pollutants of concern to the Town sewer. Since the sanitary sewer collection system is not extensive in Wilton, POTW staff can adequately address this need by using the drive-by method of investigating for potential new industries.

Section 4.5 Effectiveness and changes in program

During the 2021 compliance year, the Town continued its efforts to maintain its IPP. Industries are generally compliant with IPP requirements, and POTW compliance issues that may be attributed to industrial discharges are absent. Practices that were continued during the last year that are being performed as part of the Town's IPP include:

- Tracking of all Town and self-monitoring activities on an *Industrial Self-Monitoring, Town Monitoring and Compliance Status Matrix* (see attachment to Section 1 of this report);
- Maintaining a database to track its IUs and associated activities (sampling events, permitting, enforcement actions, inspections, etc.);
- Maintaining a focus at IU locations to minimize sources of molybdenum and copper to the Town's WWTF;
- Updating the IU database as necessary to maintain an up-to-date list of IUs;
- Investigating new or previously undocumented IU via the Town's Industrial Waste Survey Questionnaire.

Activities that are planned in 2022 or were completed in 2021 to improve the Town's IPP include:

- Continue extending the IU master list for non-significant IUs, and targeting those for which permitting at the Class 2 and Class 3 level is appropriate
- In 2021, the Town finalized its local limits re-evaluation project that started in late 2019 to account for sludge quality and NPDES permit limits. EPA approved the Town's January 2021 *Development of Local Pollutant Controls* document on July 13, 2021.

Overall, the Town believes its IPP is effective in controlling IU discharges.

SECTION 5 - Summary of POTW Analytical Data

A table entitled *POTW Monitoring Results* for Milford including the 2021 IPP year has been included as an attachment to this section of the IPP report.

Milford performed its annual comprehensive sampling event in October 2021 on the wastewater treatment facility raw influent and final effluent. Analyses performed were: total cyanide, pH, volatile organic compounds, semi-volatile organic compounds, pesticides/PCBs, metals, Kjeldhal nitrogen, ortho-phosphate and total phosphorous.

Wastewater from Wilton is monitored for conventional pollutants once a week. The Milford POTW conducted a comprehensive sampling event of Wilton's discharge in October 2021. Analyses performed were: total cyanide, pH, volatile organic compounds, semi-volatile organic compounds, pesticides/PCBs, metals, Kjeldhal nitrogen, ortho-phosphate and total phosphorous. The results showed no unusual amount of pollutants originating from the Wilton area.

The Town sampled the wastewater treatment facility's final effluent once per quarter for whole effluent toxicity per the requirements of Milford's NPDES permit. All sixteen toxicity testing results for the 2021 reporting period met permit limitations.

The attached *POTW Monitoring Results* table also includes comparisons of:

- Effluent monitoring results to surface water quality criteria. This comparison is NOT adjusted to account for the dilution factor of the WWTF effluent into the Souhegan River.
- Influent monitoring results inhibitory concentrations. This comparison is NOT adjusted to account for metals removals in the primary clarifiers.
- Sludge monitoring results to applicable standards.

Copies of the POTW Whole Effluent Toxicity Testing Executive Summary pages are also attached to this section for the 2021 quarterly monitoring events.

TOWN OF MILFORD, NEW HAMPSHIRE
POTW MONITORING RESULTS COMPARISONS TO RELATED CRITERIA

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	AH	
	Date	Location	Aluminum	Antimony	Arsenic	Beryllium	Cadmium	Chromium	Copper	Lead	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Zinc	Total Phenolics	TSS	TS	TDS	Alkalinity	Ammonia	TOC	Hardness	Ortho-Phosph ate	BOD	Cyanide	Kjedhal Nitrogen	Oil & Grease (petro 25 / non-petro 100 mg/L)	VOCs (624)	ABNs (625)	Total Phosphorous	pH	
4																																			
5		Inhibitory Value (mg/L)*	-	-	0.10	-	1.0	1.0	1.0	1.0	0.1	-	1.0	-	0.25	-	0.3											0.1							
22	10/18/17	WWTF Influent	0.407	< 0.1	< 0.1	< 0.01	< 0.01	< 0.01	0.098	< 0.05	0.0002	< 0.05	0.019	< 0.1	< 0.01	< 0.1	0.362									2.98		< 0.02	58.7		2 detected	1 detected	6.92	7.2	
23	2017 Monthly	WWTF Influent							0.079																										
24	10/30/18	WWTF Influent	0.222	< 0.1	< 0.1	< 0.01	< 0.01	< 0.01	0.047	< 0.01	< 0.0001	< 0.01	< 0.01	< 0.1	< 0.01	< 0.1	0.203									2.00		< 0.02	24.1		2 detected	2 detected	3.16	7.04	
25	2018 Monthly	WWTF Influent							0.102																										
26	10/07/19	WWTF Influent	0.299	< 0.1	< 0.1	< 0.01	< 0.01	< 0.01	0.071	< 0.01	< 0.0002	< 0.01	0.028	< 0.1	< 0.01	< 0.1	0.317									2.00		< 0.02	24.1		No detects	2 detected	3.16	7.04	
27	2019 Monthly	WWTF Influent							0.060																										
28	10/14/20	WWTF Influent	0.486	< 0.1	< 0.1	< 0.01	< 0.01	0.021	0.084	< 0.01	< 0.0001	< 0.01	0.019	< 0.1	< 0.01	< 0.1	0.338									4.67		< 0.02	69.4		No detects	1 detected	8.42	7.04	
29	2020 Monthly	WWTF Influent							0.093																										
30	10/04/21	WWTF Influent	0.371	< 0.1	< 0.1	< 0.01	< 0.01	0.020	0.084	< 0.01	< 0.0001	< 0.01	0.031	< 0.1	< 0.01	< 0.1	0.274	< 0.05								2.20		< 0.02	26.2		No detects	No detects	4.38	6.94	
31	2021 Monthly	WWTF Influent	0.413						0.088																										
32																																			
33			*Inhibitory values: Most restrictive default value used, EPA Local Limits Development Guidance, July 2004, Appendix G unless otherwise noted. Silver value is from Prelim Version 4 User's Guide (May 1991), Table 3-2, p.14.																																
34																																			
35		Water Quality STANDARDS (mg/L)	0.087	0.0056	0.00014	0.0053	0.0005*	0.011	0.0062	0.0017	0.00005	-	0.0347	0.005	0.00165	0.00047	0.0796											0.0052							
36		NPDES Permit Limits Avg/Max (mg/L)	0.087				0.0014/ 0.0031		0.0144/ 0.0162	0.002/ 0.051														4.1/10.0 (JUN-OCT); 12.9 (NOV- MAY)								3 lb/day (APR-OCT)	6.5 - 8.0		
84	2/6/2017 WET	WWTF Effluent	0.45				0.0001	< 0.001	0.007	0.0003			0.0024				0.110																		
85	5/8/2017 WET	WWTF Effluent	0.42				< 0.0003	< 0.001	0.005	< 0.0003			0.0017				0.064																		
86	8/7/2017 WET	WWTF Effluent	0.45				< 0.0003	< 0.001	0.010	0.0002			0.0027				0.100																		
87	11/27/2017 WET	WWTF Effluent	0.28				< 0.0001	< 0.001	0.006	0.0002			0.0019				0.110																		
88	10/19/17	WWTF Effluent	0.28	< 0.1	< 0.1	< 0.01	< 0.001	< 0.01	0.005	< 0.002		< 0.05	< 0.01	< 0.1	< 0.01	< 0.1	0.111									2.38		< 0.02	4.95		No detects	No detects	2.43	7.0	
89	2017 Monthly	WWTF Effluent					0.008																												
90	3/19/2018	WWTF Effluent	0.23				< 0.0003	< 0.001	0.007	< 0.0003			0.0021				0.100																		
91	5/21/2018	WWTF Effluent	0.40				< 0.0003	< 0.001	0.010	< 0.0003			0.0036				0.086																		
92	8/27/2018	WWTF Effluent	0.14				< 0.0001	< 0.001	0.007	0.0002			0.0016				0.072																		
93	10/22/2018	WWTF Effluent	0.15				< 0.0003	< 0.001	0.004	< 0.0003			0.0017				0.100																		
94	10/31/18	WWTF Effluent	0.19	< 0.1	< 0.1	< 0.01	< 0.001	< 0.01	< 0.003	< 0.005	< 0.0001	< 0.01	< 0.01	< 0.1	< 0.001	< 0.1	0.007									0.56		< 0.02	1.49		No detects	No detects	0.70	7.3	
95	2018 Monthly	WWTF Effluent					0.009																												
96	3/4/2019	WWTF Effluent	0.44				< 0.0003	< 0.001	0.005	< 0.0003			0.0023				0.130																		
97	6/17/2019	WWTF Effluent	0.24				< 0.0003	< 0.001	0.003	0.0003			0.0020				0.077																		
98	8/5/2019	WWTF Effluent	0.17				< 0.0003	< 0.001	0.005	0.0004			0.0020				0.095																		
99	10/21/2019	WWTF Effluent	0.24				< 0.0003	< 0.001	0.004	0.0004			0.0024				0.110																		
100	10/08/19	WWTF Effluent	0.20	< 0.1	< 0.1	< 0.01	< 0.001	< 0.01	< 0.003	< 0.005	< 0.0001	< 0.01	< 0.01	< 0.1	< 0.01	< 0.1	0.099									0.38		< 0.02	0.907		No detects	1 detected	0.51	7.3	
101	2019 Monthly	WWTF Effluent					0.005																												
102	2/19/2020	WWTF Effluent	0.30				< 0.0003	< 0.001	0.008	< 0.0003			0.0049				0.097																		
103	6/1/2020	WWTF Effluent	0.51				< 0.0003	< 0.001	0.006	< 0.0003			0.0025				0.086																		
104	8/3/2020	WWTF Effluent	0.39				< 0.0003	< 0.001	0.003	0.0004			0.0023</																						

TOWN OF MILFORD, NEW HAMPSHIRE
POTW MONITORING RESULTS COMPARISONS TO RELATED CRITERIA

AD20

10/17/16, Influent - MTBE 0.0022 mg/L; Chloroform 0.0019 mg/L; Methylene Chloride 0.014 mg/L; Toluene 0.0041 mg/L

AE20

10/17/16 - Acetophenone 0.26 mg/L; Toluene 0.012 mg/l

AD22

10/18/17, Influent - Chloroform 2.1 ppb; Toluene 4.2 ppl

AE22

10/18/17 Influent - Acetophenone 130ppl

AD24

10/31/18, Influent - Chloroform 1.5 ppb; Toluene 1.4 ppl

AE24

10/30/18 Influent - Acetophenone 0.099 mg/L; Bis(2-ethylhexyl)phthalate 0.370 mg/L

AE26

10/7/19 Influent - Acetophenone 0.320 mg/L; Phenol 0.014 mg/l

AE28

10/14/20 Influent - Acetophenone 0.260 mg/L;

AE30

10/14/20 Influent - Acetophenone 0.260 mg/L;

I57

3/4/2013 - Split sample - average of Chemserve and ESI results

Q76

1 exceedance JAN 2015

AE76

10/8/15, Effluent - 0.055 mg/L Di-N-Butylphthalate

AD82

10/18/16, Effluent - MTBE 1 ug/L

AE100

10/15/19, Effluent - 0.031 mg/L Acetophenone

AD129

10/17/16, Wilton - Toluene 3.4 ug/l

AD131

10/18/17, Wilton - Toluene 2.5 ppt

AE133

10/29/18 - 0.015 mg/L Bis(2-ethylhexyl)Phthalate

L153

6/6/2012 Sample

B154

Targeted testing only for molybdenum and cadmium

STUDY NUMBER 34906

EXECUTIVE SUMMARY

The following summarizes the results of acute and chronic exposure bioassays performed in February 2021 to fulfill the NPDES requirements of the Milford, New Hampshire Wastewater Treatment Facility. Acute and chronic toxicity was evaluated using the freshwater species, *Ceriodaphnia dubia* and *Pimephales promelas*.

Test organisms used for the acute assays were *C. dubia*, cultured at Enthalpy, were <24 hours old *C. dubia* derived from Enthalpy cultures, and 1-14 day old *P. promelas* supplied by Aquatic Research Organisms (ARO) of Hampton, New Hampshire. Test organisms used for the chronic were <24 hours old *C. dubia* cultured at Enthalpy, and <48 hours old *P. promelas*, also supplied by ARO. Dilution water used for the *C. dubia* assay was receiving water collected from the Souhegan River upstream of the discharge. Dilution water used for the *P. promelas* was site-specific reconstituted water prepared at Enthalpy according to protocol (US EPA, 2002). Samples were received under chain of custody in good order. All sample receipt, test conditions and control endpoints were within protocol specifications except where otherwise noted.

The results presented in this report relate only to the samples described on the chain(s) of custody and sample receipt log(s), and are to be used only by the submitter. Results from the chronic and modified acute exposure assays and their relationship to permit limits are summarized in the following matrix.

Acute Toxicity Evaluation

Species	Exposure	LC-50	A-NOEC	Permit Limit (LC-50)	Effluent Meets Permit Limit	Assay Meets Protocol Limits
<i>Ceriodaphnia dubia</i> ^a	48 Hours	>100%	NC	≥100%	Yes	Yes
<i>Pimephales promelas</i>	48 Hours	>100%	NC	≥100%	Yes	Yes

Chronic Toxicity Evaluation

Species	Exposure	C-NOEC	IC-25	Permit Limit (C-NOEC)	Effluent Meets Permit Limit	Assay Meets Protocol Limits
<i>Ceriodaphnia dubia</i>	7 Days	100%	NC	≥28%	Yes	Yes
<i>Pimephales promelas</i> ^{b,c}	7 Days	100%	NC	≥28%	Yes	Yes

COMMENTS:

NC = Not Calculated.

^a On day 2 it was discovered that 6 daphnids were present in replicate C of the 25% test concentration, therefore 6 were used from initiation of the assay for data survival summary purposes. Similarly, 7 daphnids were present in replicate B of the 50% test concentration, therefore 7 were used from initiation of the assay for data survival summary purposes.

^b On day 5, due to a transfer error, one organism was lost in replicate D of the BSW laboratory control, therefore 9 organisms were used from initiation of the assay.

^c On day 3 it was discovered that 11 fish were present in replicate D of the receiving water non-diluent control, therefore 11 fish were used from initiation of the assay

STUDY NUMBER 35142

EXECUTIVE SUMMARY

The following summarizes the results of acute and chronic exposure bioassays performed in May 2021 to fulfill the NPDES requirements of the Milford, New Hampshire Wastewater Treatment Facility. Acute and chronic toxicity was evaluated using the freshwater species, *Ceriodaphnia dubia* and *Pimephales promelas*.

Test organisms used for the *C. dubia* assays were <24 hours old, derived from Enthalpy cultures, and <48hr and 1-14-day old *P. promelas* were supplied by a laboratory approved vendor for the fish assays. Dilution water used for both acute assays and for the chronic *C. dubia* assay was receiving water collected from the Souhegan River upstream of the discharge. Dilution water used for the chronic *P. promelas* assay was site-specific Brentwood Springs Water, a natural groundwater provided by an outside source. Samples were received under chain of custody in good order. All sample receipt, test conditions and control endpoints were within protocol specifications except where otherwise noted.

The results presented in this report relate only to the samples described on the chain(s) of custody and sample receipt log(s), and are to be used only by the submitter. Results from the acute and chronic exposure assays and their relationship to permit limits are summarized in the following matrix.

Acute Toxicity Evaluation

Species	Exposure	LC-50	A-NOEC	Permit Limit (LC-50)	Effluent Meets Permit Limit	Assay Meets Protocol Limits
<i>Ceriodaphnia dubia</i>	48 Hours	>100%	NC	≥100%	Yes	Yes
<i>Pimephales promelas</i>	48 Hours	>100%	NC	≥100%	Yes	Yes

Chronic Toxicity Evaluation

Species	Exposure	C-NOEC	IC-25	Permit Limit (C-NOEC)	Effluent Meets Permit Limit	Assay Meets Protocol Limits
<i>Ceriodaphnia dubia</i>	7 Days	100%	NC	≥38%	Yes	Yes
<i>Pimephales promelas</i> ^a	7 Days	100%	NC	≥38%	Yes	Yes

COMMENTS:

NC = Not Calculated.

^a Three fish were lost inadvertently due to a transfer error in replicate A of the 100% test concentration on day 6; therefore, 7 fish were used from initiation of the assay for statistical analyses purposes.

STUDY NUMBER 35319

EXECUTIVE SUMMARY

The following summarizes the results of acute and chronic exposure bioassays performed in August 2021 to fulfill the NPDES requirements of the Milford, New Hampshire Wastewater Treatment Facility. Acute and chronic toxicity was evaluated using the freshwater species, *Ceriodaphnia dubia* and *Pimephales promelas*.

Test organisms used for the *C. dubia* assays were <24 hours old, derived from Enthalpy cultures. *P. promelas*, supplied by a laboratory approved vendor, were <48hr and 1-14-day old for the acute and chronic fish assays. Dilution water used for both acute assays and for the chronic *C. dubia* assay was receiving water collected from the Souhegan River upstream of the discharge. Dilution water used for the chronic *P. promelas* assay was site-specific Brentwood Springs Water, a natural groundwater provided by an outside source. Samples were received under chain of custody in good order. All sample receipt, test conditions and control endpoints were within protocol specifications except where otherwise noted.

The results presented in this report relate only to the samples described on the chain(s) of custody and sample receipt log(s), and are to be used only by the submitter. Results from the acute and chronic exposure assays and their relationship to permit limits are summarized in the following matrix.

Acute Toxicity Evaluation

Species	Exposure	LC-50	A-NOEC	Permit Limit (LC-50)	Effluent Meets Permit Limit	Assay Meets Protocol Limits
<i>Ceriodaphnia dubia</i>	48 Hours	>100%	NC	≥100%	Yes	Yes
<i>Pimephales promelas</i>	48 Hours	>100%	NC	≥100%	Yes	Yes

Chronic Toxicity Evaluation

Species	Exposure	C-NOEC	IC-25	Permit Limit (C-NOEC)	Effluent Meets Permit Limit	Assay Meets Protocol Limits
<i>Ceriodaphnia dubia</i>	7 Days	50%	55.3%	≥38%	Yes	Yes
<i>Pimephales promelas</i>	7 Days	100% ^a	>100% ^a	≥38%	Yes ^a	Yes

COMMENTS:

NC = Not Calculated.

^a The minnow survival and growth (biomass) data demonstrated a non-standard dose response curve with a significant effect observed in only the 25% test concentration, resulting in a calculated C-NOEC of 12.5% which fails to meet the permit limit of 38%. Computation of the IC-25 for survival and growth resulted in a value of >100%. Both controls (laboratory and receiving water) met acceptability criteria and the test variability criterion (MSDp) was met. Based on this finding, a C-NOEC of 100% most likely represents the observed data.

STUDY NUMBER 35509

EXECUTIVE SUMMARY

The following summarizes the results of acute and chronic exposure bioassays performed in November 2021 to fulfill the NPDES requirements of the Milford, New Hampshire Wastewater Treatment Facility. Acute and chronic toxicity was evaluated using the freshwater species, *Ceriodaphnia dubia* and *Pimephales promelas*.

Test organisms used for the *C. dubia* assays were <24 hours old, derived from Enthalpy cultures. *P. promelas*, supplied by a laboratory approved vendor, were 1-14 days old at the start of the acute assay and <48 hours old at the start of the chronic assay. Dilution water used for both acute assays and for the chronic *C. dubia* assay was receiving water collected from the Souhegan River upstream of the discharge. Dilution water used for the chronic *P. promelas* assay was Brentwood Springs Water adjusted to the site-specific hardness of the receiving water. Brentwood Springs Water is a natural groundwater provided by an outside source. Samples were received under chain of custody in good order. All sample receipt, test conditions and control endpoints were within protocol specifications except where otherwise noted.

The results presented in this report relate only to the samples described on the chain(s) of custody and sample receipt log(s), and are to be used only by the submitter. Results from the acute and chronic exposure assays and their relationship to permit limits are summarized in the following matrix.

Acute Toxicity Evaluation

Species	Exposure	LC-50	A-NOEC	Permit Limit (LC-50)	Effluent Meets Permit Limit	Assay Meets Protocol Limits
<i>Ceriodaphnia dubia</i>	48 Hours	>100%	NC	≥100%	Yes	Yes
<i>Pimephales promelas</i>	48 Hours	>100%	NC	≥100%	Yes	Yes

Chronic Toxicity Evaluation

Species	Exposure	C-NOEC	IC-25	Permit Limit (C-NOEC)	Effluent Meets Permit Limit	Assay Meets Protocol Limits
<i>Ceriodaphnia dubia</i>	7 Days	100%	NC	≥38%	Yes	Yes
<i>Pimephales promelas</i>	7 Days	100%	NC	≥38%	Yes	Yes ^a

COMMENTS:

NC = Not Calculated.

^a The receiving water non-diluent control failed to meet the test acceptability criterion for minnow survival. These results had no impact on the assay.

SECTION 6 - Description of Interference and Pass-Through

A summary of the POTW analytical results with comparisons to applicable criteria is presented in the previous section. A discussion of individual evaluations is presented below.

Section 6.1 Effluent Toxicity

The Town sampled the wastewater treatment facility's final effluent once per quarter for whole effluent toxicity per the requirements of Milford's NPDES permit. All sixteen toxicity testing results for the 2021 reporting period complied with permit limitations.

Section 6.2 Biosolids Quality

All quarterly sludge metals results in 2021 were moderately less than the criteria values.

Section 6.3 Pass Through

Up until August 27, 2020, the POTW was operating under the requirements of the original NPDES permit that expired in 2005. Note that in previous years, the Town was operating under an administrative order that included an interim NPDES copper limit of 20 parts per billion (ppb - daily maximum and monthly average). The original 2000 NPDES permit includes monthly average and maximum daily permitted copper limits of 10.1 and 13.5 ppb, respectively.

On August 27, 2020, the POTW was issued a new NPDES permit that became effective November 1, 2020. This new permit includes copper monthly average and maximum daily limits of 14.4 and 16.2 ppb, respectively.

During the 2021 compliance year, the only metals excursion was one daily maximum copper exceedance (17.2 ppb on 2/15/21). The yearly average copper in 2021 was 8.6 ppb.

SECTION 7 - Investigations of Interference and Pass-Through

As described in Section 6 above, the Town's discharge has substantially met the established criteria (with the exception for one daily maximum copper excursion) and the Town was not made aware of any other instances of Interference or Pass-Through in 2021.

Milford continues to closely monitor sources of copper entering the collection system and is aware that certain ink discharges from print shops may be elevated in copper. Following a recommendation of Milford's Copper Optimization Engineering Study, Milford issued permits for two print shops with aqueous operations present and a third "no discharge" permit for a printer with the potential for discharge to the sewer. The permits primarily require implementation of Best Management Practices, as well as monitoring and reporting to maintain an awareness of discharge quality and pollution prevention. The print shop discharges are relatively small volume batch discharges, and control efforts at this time are primarily based on quarterly monitoring events and the BMP requirements in the permits.

SECTION 8 - Monitoring for Interference and Pass-Through

During the 2021 compliance year, the Town continued to monitor its influent, effluent, sludge and collection system in accordance with the following schedule:

LOCATION	ANALYTES	FREQUENCY
WWTF Influent	Priority pollutant metals + Mo, VOCs, ABNs, PCBs, Pesticides, Cyanide, pH, Kjeldhal nitrogen, Ortho-phosphate, and Total phosphorous	Annually
	Copper, Aluminum	2 x Monthly
WWTF Effluent	Priority pollutant metals + Mo, VOCs, ABNs, PCBs, Pesticides, Cyanide, pH, Kjeldhal nitrogen, Ortho-phosphate, and Total phosphorous	Annually
	Copper, Aluminum	2 x Monthly
WWTF Sludge	NHDES metals, Nutrients, pH, Total solids	4 x Year
	VOCs, ABNs, PCBs, Dioxins	Annually
Town of Wilton	Priority pollutant metals + Mo and Al, VOCs, ABNs, PCBs, Pesticides, Cyanide, pH, Kjeldhal nitrogen, Ortho-phosphate, and Total phosphorous	Annually
	BOD, TSS	Weekly

SECTION 9 - Reduction Efforts for SNC by SIUs

As described in Section 3 of this report, no SIUs were found to be in SNC during the 2021 IPP year.

The Town continues to perform compliance monitoring of all SIUs. Self-monitoring is also performed by all SIUs. The Town also continues to work with all SIUs to ensure that the required sampling and reporting obligations identified in their IDPs are understood.

SECTION 10 - Local Limits Adoption

The Town's current local pollutant controls (*i.e.*, local limits) were recently re-evaluated, redeveloped and approved by EPA in July 2021. As of February 2022, an updated Sewer Use Ordinance has been drafted and is waiting for final legal review and adoption by the Town. The Town expects adoption of these recently approved local limits in the next several months.